IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

GLENDA A. BURROW,	§	
	§	
Plaintiff,	§	
	§	
v.	§	**C.A. No. 4:06-cv-02672**
	§	
SHELL FEDERAL CREDIT UNION,	§	
	§	
Defendant.	§	

DEFENDANT'S INITIAL DISCOVERY DISCLOSURES

Defendant, Shell Federal Credit Union, makes these initial discovery disclosures as required by FED. R. CIV. P. 26(a)(1) and (2).

(1) *Initial Disclosures*

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of information;

1. Glenda Burrow
   c/o Mr. Albert T. Van Huff
   Monshaugen & Van Huff, P.C.
   1225 North Loop West, Suite 640
   Houston, Texas 77008
   (713) 880-2992

2. Lydia Hegwood
   Shell Federal Credit Union
   P.O. Box 578
   Deer Park, Texas 77536
   (713) 844-1100

3. Deanna Massey
   Shell Federal Credit Union
   P.O. Box 578
   Deer Park, Texas 77536
   (713) 844-1100

4. Jose Rodriguez
   Shell Federal Credit Union
   P.O. Box 578
   Deer Park, Texas 77536
   (713) 844-1100

5. Natalie May
Shell Federal Credit Union
P.O. Box 578
Deer Park, Texas 77536
(713) 844-1100

(B) A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

On August 6, 2007, Defendants produced the following documents to Plaintiff in Defendant's Response To Plaintiff's First Request for Production of Documents in Cause No. 2006-44238, *Glenda A. Burrow v. Shell Federal Credit Union*, in the 280th Judicial District of Harris County, Texas. The documents produced in that case are also responsive to this request.

INDEX OF EXHIBITS		
EXHIBIT	DOCUMENT	BATES PAGE NOS.
1	Worker's Compensation Claim File	SCFU/Burrow pp. 1 - 61
2	TWC Unemployment Compensation Claim File	SCFU/Burrow pp. 62 - 89
3	Personnel File: Attendance & Punctuality	SCFU/Burrow pp. 91 - 135
4	Personnel File: Company Notes Regarding Termination	SCFU/Burrow pp. 136 - 154
5	Personnel File: COBRA Termination Documents	SCFU/Burrow pp. 155 - 221
6	Personnel File: Payroll Notification Forms	SCFU/Burrow pp. 222 - 330
7	Personnel File: Performance Evaluations and Related Issues	SCFU/Burrow pp. 331 - 475
8	Personnel File: General Documents	SCFU/Burrow pp. 476 - 575
9	Personnel File: Benefits Documents	SCFU/Burrow pp. 576 - 642
10	Billings Statements of Katrina Grider & Associates	SCFU/Burrow pp. 643 - 645
11	Resume of Katrina Grider	SCFU/Burrow pp. 646 - 672

(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

Not applicable.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

(2) *Disclosure of Expert Testimony*

(A) On May 21, 2007, Defendant designated Katrina Grider as its expert regarding attorney's fees.

(B) Shell Federal Credit Union has no expert witness reports to be produced at this time.

Respectfully submitted,

OF COUNSEL:

KATRINA GRIDER & ASSOCIATES

By: /s/ Katrina Grider
Katrina Grider
Attorney-in-charge

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Katrinagrider@sbcglobal.net (email)

Attorneys for the Defendant,
Shell Federal Credit Union

CERTIFICATE OF SERVICE

I certify that on August 15, 2007, a copy of Defendant's Initial Discovery Disclosures was served on Plaintiff, Glenda Burrow, via electronic filing through her counsel of record:

Mr. Albert T. Van Huff
Monshaugen & Van Huff, P.C.
1225 North Loop West, Suite 640
Houston, TX 77008

/s/ Katrina Grider
Katrina Grider